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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 VICTOR SANCHEZ,

9 Plaintiff,

10 vs.

11 ALBERTSON'S LLC, a foreign limited liability
12 company; DOES 1 through 100; and ROE
13 CORPORATIONS 101 through 200,

14 Defendants.

Case No.: 2:19-cv-02017-JAD-DJA

PROPOSED} STIPULATION AND
ORDER TO EXTEND BRIEFING
SCHEDULE ON DEFENDANT'S,
SECOND MOTION FOR RULE 37
SANCTIONS [ECF 51]

15 COMES NOW, Plaintiff, VICTOR SANCHEZ ("Sanchez"), by and through his counsel
16 of record, The Schnitzer Law Firm and the Law Firm, and Defendant, ALBERTSON'S LLC
17 ("Albertsons") by and through its counsel of record the law firm Backus, Carranza & Burden,
hereby submit their Stipulation and Order to Extend the briefing deadlines to Defendant's Second
18 Motion for Rule 37 Sanctions (the "Motion") [ECF 51].

19 WHEREAS, on October 25, 2021, Albertson filed the Motion;

20 WHEREAS, Sanchez's Response to the Motion is currently due on November 8, 2021,
21 and Albertsons' Reply to the Motion is due on November 15, 2021;

22 WHEREAS, Sanchez requests additional time to prepare its Response to the Motion, and
Albertsons therefore agree that additional time is necessary to prepare the Reply;

23 WHEREAS, the Parties agree that Sanchez may have an extension of time until November
18, 2021 to Respond to the Motion;

24 WHEREAS, the Parties further agree that Albertsons may have a corresponding additional
extension of time until November 29, 2021 to file a Reply to the Response to the Motion;



1 WHEREAS, Plaintiff and Defendant agree that this extension will serve the interests of
2 the parties and judicial economy;

3 WHEREAS, this stipulation is not made for the purpose of delay or obstruction but is
4 made in good faith, and the extension will not result in prejudice to any party.

5 THEREFORE, IT IS HEREBY STIPULATED that:

- 6 1. Plaintiff, Sanchez's Response to the Motion shall be extended to November 18, 2021.
7 2. Defendant, Albertson's Reply shall also be extended until November 29, 2021.

8 THE SCHNITZER LAW FIRM

9 DATED this 8 day of November 2021

10 BY: /s/ Jordan P. Schnitzer, Esq.

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BACKUS, CARRANZA & BURDEN

DATED this 8 day of November 2021.

BY: /s/ Jacquelyn Franco, Esq.

JACK P. BURDEN, ESQ.
Nevada Bar No. 6918
JACQUELYN FRANCO, ESQ.
Nevada Bar No. 13484
Las Vegas, NV 89117
Attorneys for Defendant, Albertson's LLC

16 **ORDER**

17 IT IS SO ORDERED.

18 DATED this 9th day of November, 2021.

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21 UNITED STATES MAGISTRATE JUDGE

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